

EXHIBIT 8

[EXTERNAL EMAIL] IN RE: RGV-RGC-1007 (Luera)

Flores, Jose (USATXS) <JOSE.FLORES@usdoj.gov>

Tue 11/14/2023 10:06 AM

To: Peter McGraw (BRO) <pmcgraw@trla.org>

Cc: IGLESIAS, ALYSSA (USATXS) <ALYSSA.IGLESIAS@usdoj.gov>; Smith, John A. (USATXS) <John.A.Smith@usdoj.gov>; Arredondo, David (USATXS) [Contractor] <David.Arredondo2@usdoj.gov>; Millan, Mariam (USATXS) [Contractor] <Mariam.Millan@usdoj.gov>

Good Morning Peter,

I'm getting back to you on the issue of the Stake and Monument. I have learned that the Stake and Monument are not on Tract 1007. They are on Tract 1054 which is owned by the United States.

R,
Joe

Jose Angel Flores, Jr.

Jose Angel Flores, Jr.

Assistant United States Attorney

Southern District of Texas

United States Department of Justice

email: Jose.Flores@usdoj.gov

main: 956-723-6523 | desk: 956-721-4974 | mobile: 956-354-4804

United States Attorney's Office, 11204 McPherson Rd., Suite 100A, Laredo, Texas 78045



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RE: [EXTERNAL EMAIL] IN RE: TRACT NO. RGV-RGC-1007

IGLESIAS, ALYSSA (USATXS) <ALYSSA.IGLESIAS@usdoj.gov>

Tue 11/7/2023 11:11 AM

To: Peter McGraw(BRO) <pmcgraw@trla.org>

Cc: Flores, Jose (USATXS) <JOSE.FLORES@usdoj.gov>; Arredondo, David (USATXS) [Contractor] <David.Arredondo2@usdoj.gov>; Millan, Mariam (USATXS) [Contractor] <Mariam.Millan@usdoj.gov>; Aguilar, Maria (USATXS) [Contractor] <Maria.Aguilar@usdoj.gov>; Gomez, Florinda (USATXS) [Contractor] <Florinda.Gomez@usdoj.gov>; Mata, Stephanie (USATXS) [Contractor] <Stephanie.Mata@usdoj.gov>; Smith, John A. (USATXS) <John.A.Smith@usdoj.gov>; Corby, Erin C CIV USARMY CESWF (USA) <Erin.C.Corby@usace.army.mil>; Hope Bettler(Del) <HBettler@trla.org>

Good morning, Peter,

AUSA Flores is not in the office today, so I am responding in his stead. Thank you for bringing this to our attention. Please disregard and destroy the record of the voicemail.

Best regards,

Alyssa Iglesias



ALYSSA IGLESIAS

ASSISTANT UNITED STATES ATTORNEY

SOUTHERN DISTRICT OF TEXAS

1701 W. Bus. Hwy. 83 | Suite 600 | McAllen, TX 78501

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From: Peter McGraw(BRO) <pmcgraw@trla.org>

Sent: Tuesday, November 7, 2023 8:51 AM

To: Flores, Jose (USATXS) <JFLORES2@usa.doj.gov>

Cc: Arredondo, David (USATXS) [Contractor] <DArredondo@usa.doj.gov>; Millan, Mariam (USATXS) [Contractor] <MMillan@usa.doj.gov>; Aguilar, Maria (USATXS) [Contractor] <MAguilar@usa.doj.gov>; Gomez, Florinda (USATXS) [Contractor] <FGomez@usa.doj.gov>; Mata, Stephanie (USATXS) [Contractor] <SMata@usa.doj.gov>; IGLESIAS, ALYSSA (USATXS) <AIGLESIAS@usa.doj.gov>; Smith, John A. (USATXS) <JASMITH@usa.doj.gov>; Corby, Erin C CIV USARMY CESWF (USA) <Erin.C.Corby@usace.army.mil>; Hope Bettler(Del) <HBettler@trla.org>

Subject: [EXTERNAL] Re: [EXTERNAL EMAIL] IN RE: TRACT NO. RGV-RGC-1007

Hi Mr. Flores -

I'm sorry I missed your calls yesterday. You inadvertently left me the attached voicemail, which sounds like a privileged conversation about this tract and my representation of Mr. Luera. Please let me know how you would like me to handle this information.

Peter

From: Flores, Jose (USATXS) <JOSE.FLORES@usdoj.gov>

Sent: Monday, November 6, 2023 2:46 PM

To: Peter McGraw(BRO) <pmcgraw@trla.org>

Cc: Arredondo, David (USATXS) [Contractor] <David.Arredondo2@usdoj.gov>; Millan, Mariam (USATXS) [Contractor] <Mariam.Millan@usdoj.gov>; Aguilar, Maria (USATXS) [Contractor] <Maria.Aguilar@usdoj.gov>; Gomez, Florinda (USATXS) [Contractor] <Florinda.Gomez@usdoj.gov>; Mata, Stephanie (USATXS) [Contractor] <Stephanie.Mata@usdoj.gov>; IGLESIAS, ALYSSA (USATXS) <ALYSSA.IGLESIAS@usdoj.gov>; Smith, John A. (USATXS) <John.A.Smith@usdoj.gov>; Corby, Erin C CIV USARMY CESWF (USA) <Erin.C.Corby@usace.army.mil>; Hope Bettler(Del) <HBettler@trla.org>

Subject: RE: [EXTERNAL EMAIL] IN RE: TRACT NO. RGV-RGC-1007

Peter,

I spoke with Erin today and she indicated to me that she was not aware of anyone going into Tract RGV-RGC-1007. Like me, she was not able to open the Stakes pictures. We were finally able to convert them to JPEG files and I sent them to her. Erin will look into this matter further.

R,
Joe

From: Peter McGraw(BRO) <pmcgraw@trla.org>

Sent: Friday, November 3, 2023 3:54 PM

To: Flores, Jose (USATXS) <JFLORES2@usa.doj.gov>

Cc: Arredondo, David (USATXS) [Contractor] <DArredondo@usa.doj.gov>; Millan, Mariam (USATXS) [Contractor] <MMillan@usa.doj.gov>; Aguilar, Maria (USATXS) [Contractor] <MAguilar@usa.doj.gov>; Gomez, Florinda (USATXS) [Contractor] <FGomez@usa.doj.gov>; Mata, Stephanie (USATXS) [Contractor] <SMata@usa.doj.gov>; IGLESIAS, ALYSSA (USATXS) <AIGLESIAS@usa.doj.gov>; Smith, John A. (USATXS) <JASMITH@usa.doj.gov>; Corby, Erin C CIV USARMY CESWF (USA) <Erin.C.Corby@usace.army.mil>; Hope Bettler(Del) <HBettler@trla.org>

Subject: [EXTERNAL] Re: [EXTERNAL EMAIL] IN RE: TRACT NO. RGV-RGC-1007

Hi Mr. Flores -

Last night Mr. Luera texted me the photos attached here. I believe they show that DHS officials have already entered his property in connection with the most recent proposed border barrier construction in Starr County.

As I explained by phone earlier this week, in 20-cv-425 Mr. Luera proved sole ownership of the property within his fence by adverse possession. The attached document called 20-cv-425 tract shows an aerial view of tract that Mr. Luera owns.

DHS's most recent ROE request describes a different tract than the tract at issue in 20-cv-425. I've attached the diagram included with DHS's most recent ROE. Mr. Luera is the sole owner of the property described by RGC-1007 and property immediately to the east of that tract. The photos are of stakes and markers inside of Mr. Luera's fence just east of RGC-1007.

Can you please confirm that DHS officials will immediately stop entering Mr. Luera's property without an agreement or court order permitting their entry? I hope to receive your response no later than 5:00 PM CST, Monday, November 6, 2023.

Unfortunately, Mr. Luera will not agree to any other entries onto his property. He rejects DHS's ROE.

You can reach me directly at (956) 982-5543 with any questions.

Peter

Peter McGraw

Texas RioGrande Legal Aid

1206 East Van Buren St.

Brownsville, Texas 78520

(956) 982-5543

pmcgraw@trla.org

From: Flores, Jose (USATXS) <JOSE.FLORES@usdoj.gov>

Sent: Wednesday, October 25, 2023 11:57 AM

To: Peter McGraw(BRO) <pmcgraw@trla.org>

Cc: Arredondo, David (USATXS) [Contractor] <David.Arredondo2@usdoj.gov>; Millan, Mariam (USATXS) [Contractor] <Mariam.Millan@usdoj.gov>; Aguilar, Maria (USATXS) [Contractor] <Maria.Aguilar@usdoj.gov>; Gomez, Florinda (USATXS) [Contractor] <Florinda.Gomez@usdoj.gov>; Mata, Stephanie (USATXS) [Contractor] <Stephanie.Mata@usdoj.gov>; IGLESIAS, ALYSSA (USATXS) <ALYSSA.IGLESIAS@usdoj.gov>; Smith, John A. (USATXS) <John.A.Smith@usdoj.gov>; Corby, Erin C CIV USARMY CESWF (USA) <Erin.C.Corby@usace.army.mil>

Subject: RE: [EXTERNAL EMAIL] IN RE: TRACT NO. RGV-RGC-1007

Hi Peter,

Thank you very much for your quick response. I'm looking forward to talking to you next week. Good luck with your depositions!

Joe

From: Peter McGraw(BRO) <pmcgraw@trla.org>

Sent: Wednesday, October 25, 2023 11:51 AM

To: Flores, Jose (USATXS) <JFLORES2@usa.doj.gov>

Cc: Arredondo, David (USATXS) [Contractor] <DArredondo@usa.doj.gov>; Millan, Mariam (USATXS) [Contractor] <MMillan@usa.doj.gov>; Aguilar, Maria (USATXS) [Contractor] <MAguilar@usa.doj.gov>; Gomez, Florinda (USATXS) [Contractor] <FGomez@usa.doj.gov>; Mata, Stephanie (USATXS) [Contractor] <SMata@usa.doj.gov>; IGLESIAS, ALYSSA (USATXS) <AIGLESIAS@usa.doj.gov>; Smith, John A. (USATXS) <JASMITH@usa.doj.gov>; Corby, Erin C CIV USARMY CESWF (USA) <Erin.C.Corby@usace.army.mil>

Subject: [EXTERNAL] Re: IN RE: TRACT NO. RGV-RGC-1007

Hi Joe -

I'm in depositions all this week on another case. I'll review this and get back in touch with you early next week.

Peter

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From: Flores, Jose (USATXS) <JOSE.FLORES@usdoj.gov>

Sent: Wednesday, October 25, 2023 11:41:42 AM

To: Peter McGraw(BRO) <pmcgraw@trla.org>

Cc: Arredondo, David (USATXS) [Contractor] <David.Arredondo2@usdoj.gov>; Millan, Mariam (USATXS) [Contractor] <Mariam.Millan@usdoj.gov>; Aguilar, Maria (USATXS) [Contractor] <Maria.Aguilar@usdoj.gov>;

Gomez, Florinda (USATXS) [Contractor] <Florinda.Gomez@usdoj.gov>; Mata, Stephanie (USATXS) [Contractor] <Stephanie.Mata@usdoj.gov>; IGLESIAS, ALYSSA (USATXS) <ALYSSA.IGLESIAS@usdoj.gov>; Smith, John A. (USATXS) <John.A.Smith@usdoj.gov>; Corby, Erin C CIV USARMY CESWF (USA) <Erin.C.Corby@usace.army.mil>
Subject: [EXTERNAL EMAIL] IN RE: TRACT NO. RGV-RGC-1007

Dear Mr. McGraw:

On October 17, 2023 the United States Army Corps of Engineers referred the above captioned tract to us for further negotiations. They advised us that Mr. Luera is being represented by you and we would appreciate the opportunity to discuss the impact of the request with you.

Please review the attached letter and request for a Right of Entry and let us know if we can coordinate a phone call to further discuss this matter.

Respectfully,
Joe

Jose Angel Flores, Jr.

Jose Angel Flores, Jr.
Assistant United States Attorney
Southern District of Texas
United States Department of Justice



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